

LeBell • Dobroski • Morgan • LLP
ATTORNEYS AT LAW

May 4, 2020

Honorable William Duffin
U.S. Magistrate Judge
Eastern District of Wisconsin
517 E. Wisconsin Avenue
Milwaukee, WI 53202

RE: U.S. v. Van L. Mayes
Case No. 18 CR 154

Dear Judge Duffin,

AUSA Christopher Ladwig and I have had a number of discussions to resolve issues related to discovery. We propose the following, to the court, in light of the issues that remain: I will initially file Motions to Compel certain discovery documents, which are presently redacted, as well as for the identification of certain government witnesses. The redactions for which I seek disclosure relate to both the substance of the witnesses' statement, as well as the identity of the declarant. The investigation which is needed to be conducted by the defense, as well as the filing of pretrial motions, are stalled until this information can be obtained from the government. We both suggest that the court stay the motion schedule until you can address the discovery concerns which I will be raising in motions to be filed this week. I have discussed alternative means of disclosure with Mr. Ladwig, but it appears that the court's direction is needed at this time. Additionally, if the court deems it appropriate, I would be happy to participate in a telephonic conference with you and Mr. Ladwig.

Thank you for your consideration.

Sincerely,

/s/ Robert G. LeBell

Attorney Robert G. LeBell